

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-cr-173(PJS/DTS)

UNITED STATES OF AMERICA

Plaintiff,

**MOTION TO VACATE RESTRAINTS
ON CERTAIN SEIZED PROPERTY**

v.

ANTON JOSEPH LAZZARO et ano.,

Defendants.

Defendant Anton Lazzaro, by and through his undersigned attorneys, hereby moves this Court to vacate restraints on certain property seized by the Government and order it released to Mr. Lazzaro immediately. Specifically, Mr. Lazzaro seeks return of the following property:

- 1) \$371,240 in United States currency seized on December 15, 2020 during execution of a search warrant signed by Magistrate Menendez;
- 2) The 38 laptop computers, tablets, cellular phones and digital storage media listed at paragraphs 11(d) through 11(y) of the Indictment also seized at the time of the search warrant was executed on December 15, 2020;
- 3) A 2010 Ferrari convertible VIN ZFF65LJA9A0173846 seized August 13, 2021;
- 4) A Google Pixel mobile phone seized from Mr. Lazzaro at the time of his arrest.

The cash, vehicle, and electronics seized and restrained by the Government have not been shown to be subject to forfeiture as proceeds of or property involved in the charged criminal activity pursuant to 18 U.S.C. § 1594 and/or 21 U.S.C. § 853.

This motion is based on the Indictment, the records and proceedings herein, and the accompanying Memorandum of Law with exhibits.

Dated: October 28, 2021

Respectfully submitted,

/s/ Catherine Turner

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